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MARSH & MCLENNAN AGENCY, LLC

IN THE UNITED STATES DISTRICT COURT
FOR THE NORTHERN DISTRICT OF CALIFORNIA

MARSH & MCLENNAN AGENCY, LLC, a
Delaware limited liability company,

Plaintiff,

v.

TEROS ADVISORS, LLC, a California
limited liability company,

Defendant.

TEROS ADVISORS, LLC, a California
limited liability company,

Counter-Claimant,

v.

MARSH & MCLENNAN AGENCY, LLC,
a Delaware limited liability company,

Counter-Defendant.

Case No. 4:20-cv-02679-HSG

**STIPULATION AND ORDER DENYING
CONTINUING DATES**

MMA Complaint Filed: April 17, 2020
Teros Counter-Claim Filed: September 8, 2020
Trial Date: November 15, 2021

Plaintiff and Counter-Defendant MMA (“MMA”) and Defendant and Counter-Claimant Teros (“Teros”) (collectively “the Parties”) submit this stipulation and proposed order to continue all dates in this matter by three months based on the fact that the current discovery cut-off is prior to the first date on which Teros’s motion for judgment on the pleadings may be heard, based on the Court’s docket and schedule.

WHEREAS, MMA served its Complaint on Teros on July 10, 2020;

WHEREAS, Teros filed its Answer and Counter-claim on September 8, 2020;

WHEREAS, MMA filed its Answer to Teros’s Counter-claim on September 28, 2020;

WHEREAS, the Court set the last day to mediate the case for January 29, 2021 and the parties participated in a mediation on January 21, 2021 but were unable to resolve their disputes;

WHEREAS, the Court set the discovery cut-off for March 31, 2021;

WHEREAS, Teros intends to file a motion for judgment on the pleadings under FRCP 12(c) by no later than February 12, 2021;

WHEREAS, the earliest possible date that the motion for judgment on the pleadings may be heard, based on the Court’s current docket, is May 6, 2021;

WHEREAS, the parties wish to obtain a ruling on Teros’s motion prior to engaging in discovery;

THEREFORE, the parties stipulate to extend the cut-off dates for the above per the Court’s directive, as follows:

Activity	Current Date	Parties’ Proposal	Court’s Modified Date
Fact Discovery Cut-off	March 31, 2021	June 30, 2021	
Expert Reports	May 7, 2021	July 9, 2021	
Rebuttal Reports	May 21, 2021	August 20, 2021	
Close of Expert Discovery	June 14, 2021	September 17, 2021	
Hear Dispositive Motions	August 12, 2021	November 12, 2021	
Pre-Trial Conference	November 2, 2021	February 8, 2022	
Trial	November 15, 2021	February 22, 2022	

1 Dated: February 12, 2021

MOUND COTTON WOLLAN & GREENGRASS
LLP

3 By: /s/Lawrence Hecimovich

Jonathan Gross

Lawrence Hecimovich

Attorneys for TEROS ADVISORS, LLC

6 Dated: February 12, 2021

LITTLER MENDELSON

8 By: /s/Benjamin Emmert

Benjamin Emmert

Attorneys for MARSH & MCLENNAN
AGENCY LLC

11 **SIGNATURE ATTESTATION**

12 Pursuant to the Northern District of California's Local Rule 5-1(i)(3), I attest that
13 concurrence in the filing of the document has been obtained from each of the other Signatories.

14 Dated: February 12, 2021

15 /s/Lawrence Hecimovich

Lawrence Hecimovich

17 **IT IS SO ORDERED.**

19 Dated: 2/16/2021

